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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Administration of the North) CC Docket No. 92-237
American Numbering Plan) Phases One and Two

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JUN - 7 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

COMMENTS OF
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Summary

Sprint recommends the establishment of a single numbering organization comprised of three main parts: a neutral, non-governmental NANP administrator, an industry numbering forum and an oversight committee. The costs of this organization, and the Commission's costs of regulating numbering resources, should be financed by the industry on the same bases as are set forth in the Budget Act of 1993. Sprint also supports nationwide use of "1" as a toll indicator; a multi-year transition period to implement expanded FG D CICs; and implementation of 1+ dialing parity for interstate intraLATA MTS calls when such dialing is mandated for intrastate intraLATA toll calls.

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COMMENTS

Sprint Corporation ("Sprint"), on behalf of Sprint Communications Company, L.P., the United and Central Telephone Companies, and Sprint Cellular, hereby respectfully submits its comments on the Notice of Proposed Rulemaking released April 4, 1994 (FCC 94-79) in the above-captioned proceeding.

In the instant NPRM, the Commission has solicited comments on the following issues relating to the administration of the North American Numbering Plan ("NANP"):

- whether to assign administration of the NANP to a new, non-governmental entity;
- whether a new board should be created to assist in establishing numbering policy and resolving disputes, subject to oversight by the Commission and other regulators;
- whether to impose fees to recover the Commission's costs of regulating numbering resources and to finance the international administration of the NANP;
- whether a nationwide uniform dialing pattern using "1" as a toll indicator should be adopted;
- whether a six-year transition period should be established for the expansion of Feature Group D carrier identification codes ("CICs") from three to four digits; and
- whether the Commission should require LECs in equal access areas to deliver interstate, intraLATA 1+ MTS calls to the carrier preselected by the end user.

Sprint recommends the establishment of a single numbering organization comprised of three main parts: a neutral, non-

governmental NANP administrator, an industry numbering forum and an oversight committee. The costs of this organization, and the Commission's costs of regulating numbering resources, should be financed by the industry on the same allocation bases (all of which relate to the number of customers) as are set forth in the Budget Act of 1993.¹ Sprint also supports nationwide use of "1" as a toll indicator; a multi-year transition period to implement expanded FG D CICs; and implementation of 1+ dialing parity for interstate intraLATA MTS calls when such dialing is mandated for intrastate intraLATA toll calls. Each of these issues is discussed in further detail below.

I. A SINGLE ORGANIZATION SHOULD BE ESTABLISHED TO CONSIDER NUMBERING ISSUES.

Sprint has long advocated consolidating numbering issues before a single organization,² since such consolidation will help to ensure consistent and nondiscriminatory treatment of NANP resource requests, avoid fragmentation of numbering issues among multiple groups, and maximize the likelihood of participation by interested parties. As noted above, Sprint

¹Omnibus Budget Reconciliation Act of 1993, Public Law No. 103-66, Title VI, §6002(a), 107 Stat. 397. See also, Implementation of Section 9 of the Communications Act, Assessment and Collection of Regulatory Fees for the 1994 Fiscal Year, MD Docket No. 94-19, Notice of Proposed Rulemaking released March 11, 1994, FCC 94-46.

²In September 1992, the CLC accepted a proposal by Sprint Communications Co., L.P., that all numbering activities be consolidated into one forum and that a set of policy guidelines be developed and consistently applied to the assignment and use of all numbering resources.

recommends that this organization be comprised of three major groups: a neutral NANP administrator, an industry numbering forum (INF), and an oversight committee. The mission of these three groups, broadly stated, would be to address numbering issues and policies; to allocate numbering resources in a just and reasonable fashion; and to develop and maintain the long term numbering plan.

Sprint does not object to formation of this new organization under the auspices of the Alliance for Telecommunications Industry Solutions (ATIS),³ subject to the proviso that the oversight committee and the INF retain autonomy over their decisions (*i.e.*, ATIS could not veto or override the decisions of the committee or the INF). ATIS is a recognized legal entity with established industry forum procedures and experience in dealing with numbering issues, and attracts (and is now open to) broad participation from many industry segments. It is reasonably well positioned to provide the type of assistance (contractual, secretariat, logistics and facilities support, the handling of some legal matters, and budget and human resource management) sponsorship entails. However, because ATIS is a fairly new entity (formerly the Exchange Carriers Standards Association, its membership was only opened to non-LECs in October 1993), its sponsorship should be limited in

³The numbering organization should not serve under NECA's auspices since, as the Commission correctly pointed out (§15), NECA is an exchange carrier organization and questions as to its impartiality might arise.

duration to provide the industry with an opportunity to assess how well such sponsorship is working.

Sprint discusses below its recommendations as to the nature, structure and functions of each of the three groups comprising the numbering organization.

A. The Neutral NANP Administrator

The Commission has tentatively concluded (§16) that administration of the NANP should be transferred from Bellcore to a new, non-governmental entity. This entity would not be affiliated with any industry segment, and would be held "accountable to regulators and responsive to the needs of the industry" (*id.*).

Sprint supports the Commission's tentative decision to transfer NANP administration from Bellcore to a neutral third party. Choosing an entity not affiliated with a particular industry segment to serve as the NANP administrator (NANPA) would help to alleviate concerns that number administration is being done in an arbitrary or discriminatory fashion, and would reduce the likelihood of conflicts of interest in handling resource requests. This neutral entity could assume responsibility for the ministerial duties associated with NANP administration, primarily:

- maintaining NANP databases;⁴

⁴These databases would be administrative tools used to manage code assignments, and would not be used either to route traffic or to accomplish local or 800 number portability.

- processing applications for numbers (including NPA codes; 900 central office codes; CICs; N11 codes; vertical service codes; ANI II digits; and SS7 network address codes) in accordance with policies established by an oversight committee and INF and approved by the Commission;
- supporting the implementation of the Long Term Numbering Plan, e.g., by monitoring numbering resource trends and administering conservation techniques and other plans to replenish numbering resources; and
- managing on a centralized basis the assignment of central office codes (a function currently handled by individual LECs).

Sprint would suggest that the new NANPA be subject to the oversight committee for management and control purposes. Because the duties of the new NANPA are primarily administrative, there is no reason for a government agency, with its limited resources, to perform such functions. Governmental resources are best used to establish, approve and enforce policies governing the use of public numbering resources, and should play that role in the NANPA process.

The Commission has proposed to defer transition to a new administrator until after implementation of interchangeable numbering plan area (INPA) codes is completed (§17). To the extent that Bellcore's technical expertise is necessary to perform the administrative functions associated with implementing INPAs, and no reasonable alternatives are available, Sprint does not object to Bellcore's continuing to serve temporarily in this ministerial capacity. However, because INPA conversions are demand-driven (i.e., they will be implemented when a need for additional codes arises in different geographical areas--which may not occur in some areas for many years), Bellcore should not remain the NANPA until the entire

country has INPAs. Instead, the new NANPA should assume control as soon after January 1, 1995 (the scheduled date for the first INPA conversion) as possible.⁵

A neutral NANPA could be chosen pursuant to an RFP. Sprint suggests that a draft NANP RFP be presented to the industry by the oversight committee for comments prior to the release of the final RFP to potential bidders. Once industry comments have been incorporated into the RFP, it could be let and responses evaluated according to normal bidding procedures.⁶ Because this process will take several months, the RFP cycle would need to be initiated promptly if a new NANPA is to be chosen, trained and installed soon after January 1, 1995.

B. The Industry Numbering Forum

The second element of the single numbering organization is an industry numbering forum (INF). Through the consensus process, the INF would develop guidelines on the allocation

⁵While Sprint believes that the neutral NANPA should assume control as soon as possible, it could assume responsibility for certain functions (in particular, managing assignment of central office codes) on a phased-in basis.

⁶This process was used to select a third party administrator for the 800 Number Administration and Service Center (NASC). The 800 NASC RFP covered requirements such as technical specifications of the various NASC systems; the administrator's role and scope of responsibility; service objectives (e.g., performance standards); user and system support requirements and procedures; facilities, office equipment and telecommunications requirements; staffing; security requirements; quality assurance and control requirements; service pricing parameters; and relationship to federal and state regulators and the industry governing board.

and use of numbering resources; develop the Long Term Numbering Plan; interpret and to the extent possible ensure compliance with public policy directives; and work closely with government regulatory bodies on numbering issues.

While there are some issues which are well suited to consensus resolution by industry fora--for example, issues involving operational or administrative problems--the forum process is far from perfect. In many situations (especially those involving capital expenditures and competitive positioning), industry forum consensus simply is not possible because of conflicting business interests across various industry segments.⁷ In still other cases, even when consensus is achieved, compliance with industry-developed guidelines is not always guaranteed since compliance is generally voluntary.⁸

⁷There are some issues--in particular, those affecting the use of a finite public resource such as spectrum--which can be resolved only by the Commission as a matter of public policy.

⁸Compliance with industry guidelines would be far more widespread if the Commission were to formally adopt numbering resource guidelines which it has found to be in the public interest and thereby give such guidelines the force of law. Precedent already exists for such Commission action. For example, in CC Docket No. 91-65, the Commission developed and adopted rules governing provision of interstate 900 and other pay-per-call services.

One of the first sets of guidelines which the Commission should adopt are those relating to the assignment of central office codes. These guidelines, which were developed by the industry, have been before the Commission for some time now, and Sprint suggests that the Commission should, at a minimum, initiate a proceeding in which interested parties may comment on such guidelines. Commission action is necessary to clarify the status and enforceability of industry-developed guidelines.

In cases in which industry forum consensus is not possible, or where disputes over interpretation, implementation or compliance arise, Sprint recommends that the oversight committee should serve as the initial appeals/dispute resolution body. Parties who are dissatisfied with the oversight committee's rulings would retain the right to appeal to the Commission or other relevant regulatory bodies.

C. The Oversight Committee

Sprint supports the formation of a new, broad-based oversight committee.⁹ This committee would "establish numbering policy subject to Commission review, supervise forum consideration of numbering policies, resolve disputes between parties and forums, [and] retain and supervise the NANP administrator..." (NPRM, ¶23). In addition, it would be responsible for "process performance," that is, establishing and implementing procedures to ensure that INF discussions do not become bogged down. For example, the oversight committee might set timeframes for INF workshop discussions (so that after the allotted time elapses, individual participants could request that the issue be escalated from the INF workshop to the oversight committee for review), or adopt arbitration procedures to be used in cases of deadlock.

As is the case for the INF, the oversight committee should rely on the consensus process to accomplish these

⁹To ensure that the interests of all industry segments are fairly represented, participation on this committee (as well as the INF) should be open to all interested parties.

tasks. To the extent that consensus is not possible, the oversight committee would be responsible for assembling relevant information to present to the Commission for its consideration and resolution.

II. FUNDING OF THE SINGLE NUMBERING ORGANIZATION SHOULD BE SHARED BY ALL TELECOMMUNICATIONS SERVICE PROVIDERS WHICH USE NUMBERING RESOURCES.

Costs associated with this new system of NANP administration--letting an RFP and funding the on-going operations of the new NANPA, the INF, and the oversight committee--as well as the reasonable costs incurred by the Commission to regulate the use of numbering resources, should be shared by all telecommunications service providers which use numbering resources. Sprint suggests that these costs be recovered on the same basis as apply to service providers under the Budget Act of 1993, *i.e.*, presubscribed lines for IXCs, access lines for LECs, number of subscribers for cellular carriers and CAPs, etc. The number of lines, subscribers, etc., are readily available, measurable and auditable figures, and thus are less subject to manipulation than are other allocation bases such as revenues. Since service providers will have to determine their fee multiplier in order to comply with the 1993 Budget Act, it will require minimal incremental effort to also use these data to compute NANPA funding contributions.

Sprint suggests that Bellcore, as the current NANPA, work with ATIS (if ATIS is chosen to sponsor the single numbering organization) to develop an initial budget. Once an estimate

of the budget has been made, fee levels could be calculated using the allocation bases contained in the 1993 Budget Act. (Any fees proposed herein are intended to recover the costs of administering the NANP, and do not purport to reflect the value--actual or perceived--of the numbering resources.) If actual expenses are either higher or lower than budgeted amounts, the budget for the following year could include a true-up amount.

III. A NATIONWIDE UNIFORM DIALING PATTERN SHOULD BE ADOPTED.

Today, callers in most but not all states are required to dial "1" before making a toll call;¹⁰ states have also mandated a variety of calling arrangements (7-digit; 10-digit; and 1+ 10-digit dialing) for local calls to a foreign NPA. Bellcore, the current NANPA, had proposed that LECs be allowed to eliminate use of the digit "1" as a toll call identifier on toll calls within the home NPA as they implement interchangeable NPAs, and to allow 1+ 10-digit dialing on local calls to a foreign NPA.¹¹ In the instant NPRM (§44), the Commission has

¹⁰In California, Illinois, New Hampshire, New Jersey, New York, Pennsylvania and West Virginia, toll calls within the home NPA are now or are scheduled to be dialed on a 7-digit basis. Insofar as Sprint is aware, all parties agree that toll calls to a foreign NPA should be preceded by "1".

¹¹Bellcore's plan would thus allow the following dialing arrangements:

Home NPA		Foreign NPA	
<u>Local</u>	<u>Toll</u>	<u>Local</u>	<u>Toll</u>
7D	7D or 1+ 10D	1+ 10D	1+ 10D

requested information on the problems presented by non-uniform dialing arrangements and the specific steps it should take to remedy these problems.

Lack of a consistent dialing pattern engenders customer confusion; makes it more difficult to program, or requires the reprogramming of, PBXs, call routers and other CPE (e.g., in order to restrict toll calls); complicates IXCs' marketing and customer education programs; and adversely affects intraLATA toll competition. For example, the lack of a uniform nationwide dialing pattern often requires that callers learn new dialing arrangements when they travel or move, and blurs the line between toll and local calling so that callers are not always sure when long-distance charges apply or when they may route the call to their IXC (in cases where intraLATA toll competition is authorized).

In order to minimize these problems, the Commission should adopt a uniform nationwide calling plan which uses "1" as a toll indicator, and encourage state regulatory agencies to do likewise. Under such a system, toll calls (whether to the home or a foreign NPA) would be dialed on a 1+ 10-digit basis, and local calls would be dialed using either 7 or 10 digits.¹² The customers of all telecommunications service

¹²In congested regions such as the Washington, D.C. metropolitan area, it may be necessary to require 10-digit dialing for local calls to a foreign NPA. While there is merit to having uniform dialing arrangements for local calls across the nation, Sprint recognizes that it may be more convenient for customers in less congested areas to continue to make all local calls on a 7-digit basis.

providers (IXCs, LECs, CAPs, cellular carriers, etc.) would use the same dialing pattern.

Adoption of this uniform dialing plan would benefit consumers, IXCs, and LECs alike. Customer confusion would be minimized since callers would always know when they are making a toll call for which long-distance charges will be assessed, and would use the same dialing sequence no matter what part of the country they are in. Businesses that wish to program their CPE to restrict toll calls could do so by screening for the "1" toll indicator. IXCs would be able to instruct their presubscribed customers to always dial 1+ to make a toll call, and would be able to compete on a more equal basis with the LEC for intraLATA toll traffic (where such competition is authorized).

Consistent use of "1" as a toll indicator should also increase the efficiency of the LEC network. After implementation of interchangeable NPAs, LEC switches will be unable to distinguish quickly between toll and local calls if the toll indicator is not used--the switches would have to be programmed to wait a certain number of seconds to determine whether the caller intends to dial more than 7 digits (and, if a customer placing a 10-digit toll call does not enter the last three digits quickly enough, his call could be mis-routed). This is an inefficient use of switch capacity and increases the amount of time needed to process a call. In contrast, if "1" is used consistently, the LEC switch will

immediately recognize that an additional 10 digits are coming and can begin processing the call right away.

Sprint recognizes that implementing a uniform nationwide dialing plan will entail some customer reeducation efforts and possibly some LEC switch reconfigurations no matter what plan is adopted. However, the benefits of a uniform plan clearly outweigh any possible expenditure of resources to accomodate uniform dialing by specific parties.

There is also a need for expedition in mandating a uniform plan. Several LECs which plan to allow 7-digit toll calling have not yet implemented such dialing arrangements. It surely would be more efficient and cheaper to convert to a uniform dialing plan before 7-digit toll calling is implemented, than afterwards.

IV. EXPANDED FG D CARRIER IDENTIFICATION CODES SHOULD BE PHASED IN.

The Commission has proposed that the transition from 3 to 4-digit carrier identification codes (CICs) take place over a six-year period (§54). During this transition or permissive dialing period, subscribers could use both 3 and 4-digit CICs.

Sprint agrees that a multi-year transition period is needed. However, it is not clear at this point whether six years constitutes an appropriate transition period. On the one hand, there are millions of subscribers who are familiar with the 3-digit format who would have to be reeducated. There are also an unknown number of CPE units which would have to be reprogrammed or replaced in order to accomodate expanded

CICs. On the other hand, carriers who are given 4-digit CICs may suffer a competitive disadvantage since their subscribers must dial more digits than would be the case if the carrier had a 3-digit CIC.¹³ It is not clear how much of a disadvantage the dialing of extra digits necessitated by 4-digit CICs poses. An issue has been introduced at the Industry Numbering Committee to conduct an end user survey regarding subscribers' perceptions about the meaning and length of dialing arrangements. Sprint suggests that a decision about the length of the transition period be deferred pending evaluation of the results of this survey.

In the interim, Sprint urges a more aggressive CIC reclamation effort. Bellcore can only request that carriers with multiple CICs return excess codes to the pool for reassignment. Although the industry as a whole would be better off if all carriers complied with the request to return excess CICs, individual carriers are generally reluctant to do so if they believe that their competitors are not doing so as well. Therefore, the Commission should consider requiring carriers to turn in their excess CICs. Such action might help to stave off CIC exhaustion for another few years.

¹³Subscribers using 3-digit CICs could access their IXC by dialing 10XXX; subscribers using 4-digit CICs would need to dial 101-XXXX.

V. PRESUBSCRIPTION FOR INTERSTATE INTRALATA AND INTRASTATE INTRALATA TOLL CALLS SHOULD BE IMPLEMENTED SIMULTANEOUSLY.

The Commission has requested comment on whether it should require LECs "to cease screening and completing interstate intraLATA '1+' MTS calls and, instead, deliver those calls to the carrier preselected by the end user unless the preliminary routing numbers indicate otherwise" (NPRM, ¶58).

According to the TRPs filed with the 1994 annual access charge tariffs (form SUM-1), interstate intraLATA revenues for the BOCs and Sprint/United totalled \$358.1 million. Although this is not a huge market (NPRM, ¶57), Sprint believes that the consumer benefits of presubscription apply as much to these calls as to interLATA traffic. Nonetheless, software limitations and the costs associated with implementing interstate intraLATA presubscription do not warrant implementation of 1+ calling for this traffic in all LATAs at the current time.

It is Sprint's understanding that the current design of switch software required for intraLATA presubscription requires presubscription of all intraLATA toll calls, both interstate and intrastate. Thus, if the FCC required interstate intraLATA presubscription,¹⁴ LECs would be forced to offer intrastate intraLATA presubscription at the same time, even if IXCs do not have intrastate intraLATA authority. It is not known how much it would cost to develop new software

¹⁴As the Commission recognized (fn. 93), only interstate calls are within its purview.

which could distinguish between interstate and intrastate intraLATA traffic. However, Sprint's local division estimates that upgrading the switches in those of its FG D offices which handle interstate intraLATA toll calls with currently available presubscription software would cost approximately \$810,000. Additional costs would be incurred if the Commission also required customer balloting.¹⁵

Given the software limitations involved, Sprint recommends that the Commission not require interstate intraLATA presubscription at this time. However, Sprint does suggest that interstate intraLATA toll calls be subject to presubscription when a state regulatory agency orders 1+ presubscription for intrastate intraLATA toll calls.

The Commission has suggested that "it is possible that the treatment of intraLATA toll would best be considered in conjunction with BOC requests for entry into the interLATA market" (fn. 96). This suggestion should be rejected. The BOCs are barred from providing interLATA services under the MFJ because of their bottleneck control over exchange access facilities, and nothing has changed to warrant the lifting of this restriction. Today, and for the foreseeable future, the BOCs retain a virtual monopoly over such facilities, and such monopoly is entirely unrelated to whether interstate intraLATA toll calls are subject to presubscription. Thus, no *quid pro*

¹⁵Sprint believes that the costs of balloting existing FG D customers far outweigh the benefits and urges that balloting be required only with future equal office conversions.

quo is required or justified in regards to the implementation of presubscription for interstate intraLATA toll calls.

Furthermore, the Commission has "previously rejected the notion that intraLATA interstate traffic is specifically reserved for the local exchange carrier."¹⁶ Since the BOCs would not be giving up any "right" by implementing 1+ presubscription for interstate intraLATA toll calls, there is here again no reason to link such presubscription to BOC entry into the interLATA market.


¹⁶Southwestern Bell Telephone Company Revisions to Tariff FCC No. 68 (Transmittal No. 1629), CC Docket No. 88-287, *Memorandum Opinion and Order* released June 3, 1988 (DA 88-858), ¶18, citing GTE Telephone Operating Companies, 2 FCC Rcd 3345, 3346 (1987) and GTE Telephone Operating Companies, Transmittal Nos. 247, 259, and 277, *Order* released July 31, 1987 (DA 87-1101), ¶13.

VI. CONCLUSION.

For the reasons cited above, Sprint requests that the Commission adopt the recommendations associated with the administration of the NANP contained herein.

Respectfully submitted,

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I hereby certify that a copy of the "Comments" of Sprint Corporation have been sent via first-class mail, postage-prepaid, on this 7th day of June, 1994 to the below-listed parties:

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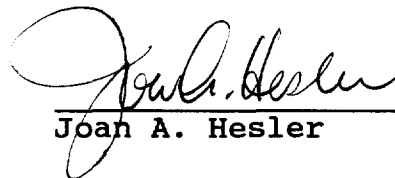
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